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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION TO
WAYMO'S MOTION FOR LEAVE TO
FILE AMENDED LIST OF ELECTED
TRADE SECRETS, SUPPLEMENTAL
EXPERT REPORTS, AND REVISED
WITNESS AND EXHIBIT LISTS**

Trial Date: December 4, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Opposition to Waymo LLC's Motion to for Leave to File Amended List of
7 Elected Trade Secrets, Supplemental Expert Reports, and Revised Witness and Exhibit Lists.

8 2. Attached as Exhibit 1 is a true and correct copy of an email from me, as counsel
9 for Uber and Ottomotto, to Felipe Corredor, counsel for Waymo, dated August 16, 2017.

10 3. Attached as Exhibit 2 are true and correct copies of relevant pages from Waymo's
11 confidentiality designations to the August 18, 2017 deposition of Don Burnette served on
12 August 25, 2017.

13 4. Attached as Exhibit 3 are true and correct copies of relevant pages from Waymo's
14 confidentiality designations to the August 18, 2017 deposition of Don Burnette served on
15 October 19, 2017.

16 5. Attached as Exhibit 4 is a true and correct copy of an article by C. Katrakazas,
17 et al., titled "Real-time Motion Planning Methods for Autonomous On-Road Driving; State-of-
18 the-Art and Future Research Directions."

19 6. Attached as Exhibit 5 are true and correct copies of relevant pages from the
20 October 17, 2017 deposition of Mary Fulginiti.

21 7. Attached as Exhibit 6 are true and correct copies of relevant pages from the
22 July 28, 2017 deposition of Samuel Lenius.

23 8. Attached as Exhibit 7 are true and correct copies of relevant pages from the
24 August 24, 2017 deposition of Christian Lauterbach.

25 9. Attached as Exhibit 8 are true and correct copies of relevant pages from the
26 July 26, 2017 deposition of Zachary Morris.

27 10. Attached as Exhibit 9 is a true and correct copy of a document produced in this
28 litigation on September 13, 2017, bearing Bates numbers UBER00312645 to UBER00312653.

12. Attached as Exhibit 11 is a true and correct copy of an email from Felipe Corredor (counsel for Waymo) to Arturo Gonzalez (counsel for Uber) dated June 18, 2017.

/s/ *Esther Kim Chang*
ESTHER KIM CHANG

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: October 25, 2017

/s/ Arturo J. González
Arturo J. González